UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

PREPARED FOOD PHOTOS, INC. f/k/a ADLIFE MARKETING & COMMUNICATIONS CO., INC.,

Plaintiff,

v. Case No.: 22-CV-642

NOFAL, LLC d/b/a FOOD TOWN MART and SHARIF JABER,

Defendants.

DECLARATION OF W. TIMOTHY STEINLE IN SUPPORT OF DEFENDANTS, NOFAL LLC d/b/a FOOD TOWN MART AND SHARIF JABER'S MOTION FOR ATTORNEYS FEES

- I, W. Timothy Steinle, declare under penalty of perjury and pursuant to 28 U.S.C.§1746 of the following is true and correct:
 - I submit this declaration in support of the defendant Nofal LLC d/b/a Food Town
 Mart and Sharif Jaber's Motion for attorneys fees. I have personal knowledge of
 the facts stated herein and if called upon and sworn as a witness I could testify
 competently to them.
 - I am attorney duly licensed to practice law in the State of Wisconsin. I am
 admitted to practice in all circuit courts in the State of Wisconsin as well as in the
 Eastern and Western District Federal Courts.
 - 3. I previously represented the defendants, Nofal, LLC d/b/a Food Town Mart and Sharif Jaber in the above-referenced matter.

- 4. I graduated from Marquette University Law School in 1980 and began to practice law as an Assistant District Attorney in Barron County, Wisconsin and spent approximately six years as an Assistant District Attorney in Racine County, Wisconsin.
- 5. During my tenure in the District Attorneys' Offices, I became Senior Assistant
 District Attorney handling violent crimes, prosecuting complex arson cases, and
 vehicular homicide cases. Although I do not know the exact number, I tried a
 significant number of jury trials to verdict.
- 6. I was hired by Frisch, Dudek and Slattery, Ltd. in Milwaukee as an Associate attorney in approximately 1986. I was principally assisted the partners in the defense of complex civil litigation including defending companies against product liability claims and against serious injury claims. Again, I tried numerous jury trials during this time.
- 7. After a short time at a plaintiff's personal injury firm, I partnered with Attorney Frank R. Terschan in 1994 and created the law firm of Terschan & Steinle, Ltd. In 2013 we merged with the firm of Hodan, Doster and Ganzer, S.C. and created the law firm of Terschan, Steinle, Hodan & Ganzer, Ltd. I continued to focus my practice on insurance defense work which included defending against construction defect claims, wrongful death claims and other serious injuries.

 During this time in private practice it included trying cases to a jury including in circuit court in many counties throughout the State of Wisconsin and trying jury trials in the Federal Western District and the Federal Eastern District Courts. I continued to be a named partner with Terschan, Steinle, Hodan & Ganzer, Ltd.

- 8. In the course of my sole practice, I became acquainted with the Jaber family over 20 years ago. The Jaber family is an extremely large family with many siblings and most are entrepreneurs.
- 9. By virtue of my personal and professional relationship with the Jaber family, I agreed to charge the family a reduced hourly rate of \$250.00 per hour for attorney time, and \$100 per hour for travel time. Otherwise, my usual and customary rate is \$400.00 per hour for corporate matters.
- 10. I was contacted by Sharif Jaber and Nofal, LLC on January 19, 2023.
- 11. He presented me with the allegations and I conducted some research. Although I had not previously handled an alleged copyright violation, I felt that I had the experience to assist Shariff Jaber in the defense of the claims being made.
- 12. I was retained by Sharif Jaber and Nofal, LLC, d/b/a Food Town Mart, on January 19, 2023.
- 13. During the course of my representation of the defendants, Nofal, LLC d/b/a Food
 Town Mart and Sharif Jaber, I provided my clients with regular billings for
 services rendered.
- 14. This declaration is based upon my personal knowledge of the facts stated herein or those facts as they appear in the business records of my firm. These records (1) were made at or near the time by, or from information transmitted by, someone with knowledge of the facts reflected in such records, including the attorneys and other professionals working on this litigation, (2) are kept in the course of the firm's regularly conducted activity, and (3) it was and is the regular practice of my firm to keep such records, specifically including records of time worked by

- attorneys and other professionals and expenses incurred by the firm on behalf of clients.
- 15. I have attached copies of my billings beginning February 28, 2023 through

 December 4, 2024 for services rendered as well as our Client Ledger Report
 summarizing the fees billed and payments made.
- 16. Prior to sending the invoices, I reviewed the time entries.
- 17. Following my filing of the Brief in Response to Plaintiff's Motion for Amendment and Motion for New Trial, on December 4, 2024, I did not bill further, including for review of additional filings by the plaintiff, as well as the drafting of the Motion to Withdraw, and in connection with Jaber's motion for attorney's fees.
- 18. Two partners, myself and Attorney Amber Herda, and one paralegal (Sue Kranz) assisted with this matter. Ms. Herda's and Ms. Kranz's backgrounds are as follows:
 - a. Amber Herda joined our firm on August 1, 2014 as an associate and became a shareholder partner on January 1, 2019. She is a 2008 graduate of Cooley Law School, having competed in Moot Court and obtaining litigation experience with the State Public Defender's office under the student practice rule. Upon being admitted to the Wisconsin Bar, she has extensive experience litigating civil matters. Her role in this case was limited to assisting on the summary judgment motion and plaintiff's Rule 59 motion.
 - b. Sue Kranz is a paralegal who has been with my firm since 1994. She assisted with some discovery matters and my trial preparation.

- In total, I spent 119.6 hours representing Sharif Jaber, while Ms. Herda spent 5.0 hours, and Ms. Kranz spent 4.1 hours.
- 20. True and correct copies of Shumaker's supporting invoices for this matter are attached as Composite Exhibit A. The invoices contain (1) the date of each time entry for work performed in this matter, (2) the name of the attorney or other professional who performed the work, (3) a description of the work performed, (4) the amount of time spent on the work, (5) the hourly rate for the work, and (6) the amount billed.
- 21. My firm takes into account many factors in billing for services rendered, and all statements are reviewed before they are issued to ensure that the amount charged is appropriate. Statements for services are simply the product of the hours worked multiplied by the hourly rates for the attorneys and other professionals who did the work.
- 22. From my own professional background, as well as my investigation and experience in connection with this case, I am familiar with the cost of litigation in Milwaukee, Wisconsin, including hourly rates charged by various levels of timekeepers from partners, to associates, to paralegals.
- 23. As a result of my experience, training, and investigation, as summarized above, I am of the opinion that the hourly rates charged by my firm are reasonable given the level of experience for the timekeepers involved, the current Milwaukee market, and the requisite skill involved in the defense of a copyright infringement case in federal court.

- 24. I am also of the opinion that the number of hours expended by the attorneys and
 - other professionals at their respective hourly rates was reasonable and not
 - excessive for a case such as this one, and, in total, those fees were of the
 - magnitude that would have been charged by lawyers of the same skill level under
 - similar circumstances involved in similar cases with similar clients.
- 25. According to the American Intellectual Property Law Association (AIPLA) 2023
 - Economic Survey which reflects rates from 2022, the average cost of a copyright
 - litigation (where less than \$1M is at risk) is \$296,000 through post-trial. Through
 - discovery and motions the average cost of a lawsuit is \$136,000. The average
 - billing rate for intellectual property equity partners in "Other Central" geographic
 - area (which includes Wisconsin) is \$441 per hour, while the median is \$403. The
 - range of rates is between \$341 and \$513. Attached hereto as Exhibit B are the
 - relevant tables from the AIPLA report.
- 26. Attached as Exhibit C are the invoices concerning costs that my firm advanced on
 - behalf of Jaber, totaling \$416.25.

/W. Timothy Steinle/

W. Timothy Steinle

State Bar No.: 1003777

Composite Exhibit A

Statement Date: February 28, 2023

Account No.

7111.001

\$1,150.00

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RE: Prepared Food Photos, Inc. v. Jaber

			Rate	HOURS	
01/19/2023	WTS		250.00	1.20	
01/23/2023	WTS	Email exchange with Attorney Dan DeSouza.	250.00	0.10	
01/25/2023	WTS	Email exchange and conference call with Attorney DeSouza.	250.00	0.30	
02/09/2023	WTS	Email exchange with Attorney DeSouza.	250.00	0.20	
02/21/2023	02/21/2023 WTS Review Second Amended Summons and Complaint, draft Answer and Affirmative Defenses, Notice of Retainer and Disclosure Statement. LEGAL SERVICES		250.00	2.80 4.60	1,150.00
		RECAPITULATION			
TIMEKEEPER W. Timothy Steinle				<u>OTAL</u> 50.00	
		TOTAL CURRENT WORK			1,150.00

Effective May, 1 2025, Please send all payments to:

Terschan, Steinle, Hodan & Ganzer, Ltd. 16680 Cleveland Ave. Sutie E New Berlin, WI 53151

BALANCE DUE

"PLEASE WRITE ACCOUNT NUMBER ON YOUR CHECK FOR PROPER CREDIT"

Payments received after 30th day of month will be shown on your next statement. We are now accepting credit card payments. You MUST have an email address. Call for more information.

Statement Date:

May 15, 2023

Account No.

7111.001

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00/04/0000	MTO	Dueft accommodate of All as D.O. P. D. D.O.	Rate	HOURS	
03/21/2023	WTS	Draft correspondence to Attorney DeSouza regarding Rule 26 Report.	250.00	0.20	
03/22/2023	WTS	Review draft of Rule 26 Report. Edit and revise. Draft correspondence to Attorney DeSouza.	250.00	0.40	
03/27/2023	WTS	Review various emails from Attorney DeSouza, draft response.	250.00	0.80	
03/29/2023	WTS	Review and calendar Scheduling Order and Order for plaintiff's counsel to retain local counsel.	250.00	0.30	
05/02/2023	WTS	Review additional Order regarding plaintiff's counsel retaining local counsel.	250.00	0.10	
05/15/2023	WTS	Review file and draft status letter to Mr. Jaber. LEGAL SERVICES	250.00	$\frac{0.30}{2.10}$	525.00
		RECAPITULATION			
		EKEEPER HOURS HOURLY RATE 2.10 \$250.0	_	<u>OTAL</u> 25.00	
		TOTAL CURRENT WORK			525.00
		PREVIOUS BALANCE			\$1,150.00
		BALANCE DUE			\$1,675.00

Page: 2 05/15/2023 Acct.# 7111-001M

Prepared Food Photos, Inc. v. Jaber

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Statement Date:

August 31, 2023

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			Rate	HOURS	
06/28/2023	WTS	Review Plaintiff's First Discovery Requests . Draft correspondence to Mr. Jaber.	250.00	0.80	
08/16/2023	WTS	Conference with Mr. Jaber regarding Request to Admit. Draft responses to Request to Admit. Draft correspondence to Attorney Cruz with responses.	250.00	1.20	
08/17/2023	WTS	Conference with Mr. Jaber. Draft responses to Interrogatories and Request for Production of Documents. Review correspondence from plaintiff's counsel regarding deposition dates. LEGAL SERVICES	250.00	2.10 4.10	1,025.00
		RECAPITULATION			
		EKEEPER HOURS HOURLY RATE (100 Section 100	_	OTAL 25.00	
		TOTAL CURRENT WORK			1,025.00
		PREVIOUS BALANCE			\$1,675.00
05/31/2023 05/31/2023		Payment received, thank you. Payment received, thank you. TOTAL PAYMENTS			-1,150.00 -500.00 -1,650.00
		BALANCE DUE			\$1,050.00

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Prepared Food Photos, Inc. v. Jaber

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Statement Date:

October 9, 2023

Account No.

7111.001

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Rate HOURS

09/22/2023	WTS	S Receive/review email from Attorney Dan DeSouza regarding amending the Scheduling Order.		250.00	0.20		
09/26/2023	WTS	Meet with Sharif Jaber to prepare for his deposition, attend deposition of Sharif Jaber.		250.00	3.00		
10/02/2023	WTS	Receive/review email from Dan DeSouza with proposed new dates and deadlines for the Scheduling Order, respond. Review photos from plaintiff's attorney, draft correspondence to Mr. Jaber. LEGAL SERVICES			250.00	0.90 4.10	1,025.00
		RECAPITULA	ATION				
	TIME	KEEPER	HOURS HOURL	Y RATE	TOTA	<u>AL</u>	
	W. T	imothy Steinle	4.10	\$250.00	\$1,025.	00	
Advances							
09/29/2023		Deposition Transcript Sharif Jaber					225.00
		TOTAL ADVANCES					225.00
		TOTALABOANOLO					220.00
		TOTAL CURRENT WORK					1,250.00
		PREVIOUS BALANCE					\$1,050.00
		BALANCE DUE					\$2,300.00

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Prepared Food Photos, Inc. v. Jaber

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Statement Date: November 21, 2023

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725.00

\$2,300.00

RE: Prepared Food Photos, Inc. v. Jaber

TOTAL CURRENT WORK

PREVIOUS BALANCE

10/02/2022	MITO	Description Order from Country and discrete Amended Cabadulina	Rate	HOURS	
10/03/2023	WIS	Receive/review Order from Court regarding Amended Scheduling Order. Calendar dates.	250.00	0.20	
10/09/2023	WTS	Receive/review email from plaintiff's counsel requesting status of Mr. Jaber's position on this matter.	250.00	0.10	
	WTS	Receive/review Subpoena to Produce Documents, Information and Objects.	250.00	0.20	
10/16/2023	WTS	Receive/review subpoena for Amjad Hamed. Calendar.	250.00	0.20	
10/18/2023	WTS	Receive/review email from plaintiff's counsel requesting status of			
		Mr. Jaber's position. Respond.	250.00	0.10	
	WTS	Meeting with Sharif Jaber.	250.00	0.30	
10/31/2023	WTS	Receive/review email from plaintiff's counsel regarding telephone	250.00	0.10	
		conference. Respond.	250.00	0.10	
	WTS	Telephone conference with plaintiff's counsel.	250.00	0.30	
11/08/2023	WTS		050.00	0.00	
		deposition date.	250.00	0.20	
11/13/2023	WTS				
		Facebook/Meta records. Telephone call to client to schedule a meeting.	250.00	1.20	
		LEGAL SERVICES		2.90	725.00
		RECAPITULATION			
	TIME	EKEEPER HOURS HOURLY RATE		OTAL	
	W. T	Fimothy Steinle 2.90 \$250.00	\$7	25.00	

Sharif Jaber

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Prepared Food Photos, Inc. v. Jaber

BALANCE DUE

\$3,025.00

Effective May, 1 2025, Please send all payments to:

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Statement Date: December 15, 2023

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RE: Prepared Food Photos, Inc. v. Jaber

PREVIOUS BALANCE

\$3,025.00

-25.00	Payment received, thank you.	11/21/2023
-1,025.00	Payment received, thank you.	11/21/2023
-1,250.00	Payment received, thank you.	11/21/2023
-700.00	Payment received, thank you.	11/21/2023
-3,000.00	TOTAL PAYMENTS	
\$25.00	BALANCE DUE	

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Statement Date:

February 2, 2024

Account No.

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RE: Prepared Food Photos, Inc. v. Jaber

			Rate	HOURS	
12/15/2023	WTS	Email exchange with Daniel DeSouza regarding Monday deposition of Amjad Hamed.	250.00	0.10	
01/05/2024	WTS	Meeting with Sharif Jaber regarding Motion Hearing on January 8, 2024.	250.00	0.20	
01/08/2024	WTS	Travel to Federal Courthouse, attend Motion to Compel Hearing, meeting with client following hearing, return travel.	250.00	1.30	
	WTS	Receive/review deposition transcript of Amjad Sharif Hamed. Draft status letter to client provided Order of the Court and deposition transcript.	250.00	0.60	
01/09/2024	WTS	Receive/review Plaintiff's Motion for Summary Judgment, supporting Brief and Affidavit.	250.00	1.10	
01/15/2024	WTS	Meet with Sharif Jaber to go over documents requested by plaintiff. Review documents. Draft responses to Plaintiff's Request to Produce. Email to Sharif Jaber reminding him to forward balance sheets responsive to discovery requests. Draft letter to Attorney DeSouza forwarding documents.	250.00	2.50	
		-			
01/16/2024	WTS	Text to Sharif Jaber regarding balance sheets.	250.00	0.10	
01/17/2024	WTS	Text and email to Sharif Jaber regarding balance sheets.	250.00	0.10	
01/30/2024	WTS	Begin review of file materials. conduct legal research, in preparation to begin drafting response to Plaintiff's Motion for Summary Judgment.	250.00	2.50	
02/02/2024	SK	Organize and scan all file materials provided by Sharif Jaber and forward to plaintiff's counsel. LEGAL SERVICES	100.00	0.80 9.30	2,205.00

RECAPITULATION

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL
W. Timothy Steinle	8.50	\$250.00	\$2,125.00
Sue Kranz	0.80	100.00	80.00

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Prepared Food Photos, Inc. v. Jaber

Advances

01/08/2024 01/31/2024	Deposition Transcript Amjad Hamed FedEx Overnight Shipping of Delinquent Discovery Responses to Plaintiff's Counsel TOTAL ADVANCES	191.25 116.09 307.34
	TOTAL CURRENT WORK	2,512.34
	PREVIOUS BALANCE	\$25.00
	BALANCE DUE	\$2,537.34

Effective May, 1 2025, Please send all payments to:

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02/06/2024 WTS		Review file, review plaintiff's Motion, review case law and federal		Rate	HOURS		
		rules, begin drafting Memorandum in Response to Pl for Final Summary Judgment.			250.00	7.00	
02/07/2024	WTS	Continue legal research and drafting of Memorandun to Plaintiff's Motion for Final Summary Judgment.	n in Resp	onse	250.00	5.50	
02/08/2024	WTS	•			250.00	4.00	
	AH Review Summary Judgment Response Brief, conduct additional legal research, edit, check legal authority citations and finalize. LEGAL SERVICES			250.00	2.00 18.50	4,625.00	
		RECAPITULATION	N				
		KEEPER HOL	URS HO	URLY RATE	TOTAL		
			2.00	\$250.00		00.00	
W. Timothy Steinle		imothy Steinle	6.50	250.00	4, 12	25.00	
		TOTAL CURRENT WORK					4,625.00
PREVIOUS BALANCE					\$2,537.34		
		BALANCE DUE					<u>\$7,162.34</u>

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Prepared Food Photos, Inc. v. Jaber

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Statement Date:

May 3, 2024

Account No.

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Data HOURS

RE: Prepared Food Photos, Inc. v. Jaber

			Rale	HOUKS	
04/11/2024	WTS	Review file draft Final Pre-Trial Report for federal court, jury			
		instructions and special verdict. File with the Court.	250.00	6.00	

LEGAL SERVICES 6.00 1,500.00

RECAPITULATION

 TIMEKEEPER
 HOURS HOURLY RATE
 TOTAL

 W. Timothy Steinle
 6.00
 \$250.00
 \$1,500.00

TOTAL CURRENT WORK 1,500.00

PREVIOUS BALANCE \$7,162.34

 03/27/2024
 Payment received, thank you.
 -25.00

 03/27/2024
 Payment received, thank you.
 -2,512.34

 03/27/2024
 Payment received, thank you.
 -624.66

 TOTAL PAYMENTS
 -3,162.00

 BALANCE DUE
 \$5,500.34

Effective May, 1 2025, Please send all payments to:

Terschan, Steinle, Hodan & Ganzer, Ltd. 16680 Cleveland Ave. Sutie E New Berlin, WI 53151

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Statement Date: November 4, 2024

Account No. 7111.001

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			Rate	HOURS
06/10/2024	WTS	Letter to client regarding outstanding invoice and request that he call to schedule an appointment to discuss case status.	250.00	0.20
07/02/2024	WTS	Letter to client regarding outstanding invoice.	250.00	0.10
07/10/2024	WTS	Letter to client regarding Trial Scheduling Order and request that he make an appointment to discuss case status.	250.00	0.20
07/24/2024	WTS	Letter to client to discuss lack of communication, fees and court deadlines. Requested he contact to schedule appointment.	250.00	0.30
08/27/2024	WTS	Various phone calls leaving messages regarding case. Letter to client regarding invoice and Court deadlines. Requested client cooperation.	250.00	0.20
08/28/2024	WTS	Meeting with client to discuss pros and cons of trial versus settlement. Client wishes to move forward to trial.	250.00	0.20
09/05/2024	WTS	Receive/review email from plaintiff's counsel.	250.00	0.10
09/10/2024	WTS	Receive/review email from plaintiff's counsel. Letter to client forwarding email requesting contact from client and payment of outstanding invoice.	250.00	0.40
09/19/2024	WTS	Letter to counsel regarding pre-trial report.	250.00	0.20
	WTS	Receive/review email from plaintiff's counsel.	250.00	0.10
09/24/2024	WTS	Letter to client regarding invoice and request for contact.	250.00	0.20
09/25/2024	WTS	Receive/review email from plaintiff's counsel.	250.00	0.10
09/30/2024	WTS	Telephone call with Jeff Leavell regarding final pre-trial report and setting in person meeting to discuss.	250.00	0.30
	WTS	Review draft of Final Pre-Trial Report, Jury Instructions and Special Verdict in anticipation of in person conference with plaintiff's counsel.	250.00	1.50

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Prepared Food Photos, Inc. v. Jaber

TIMEKEEPER

W. Timothy Steinle

W. Timothy Steinle

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			Data	HOURE	
10/01/2024	WTS	Draft letter to client regarding upcoming trial preparations.	Rate 250.00	HOURS 0.30	
10/02/2024	WTS	Review file materials, case law, federal rules for trial in anticipation of meet and confer on October 3, 2024.	250.00	3.00	
10/03/2024	WTS	Travel to and from Attorney Jeff Leavall's office in Racine for meet and confer with plaintiff's counsel.	100.00	1.50	
	WTS	Meet with plaintiff's counsel, per the Order of the Court to prepare, edit and finalize the Joint Final Pre-Trial Report.	250.00	2.50	
10/07/2024	WTS	Travel to/from Federal Courthouse to hand deliver, pursuant to the Court's Order, Joint Final Pre-Trial Report.	100.00	0.50	
10/15/2024	WTS	Travel to/from Federal Courthouse to attend Final Pre-Trial Conference.	100.00	0.50	
	WTS	Attend Final Pre-Trial before Judge Stadmueller. Receive/review email from plaintiff's counsel, forward to client requesting he call to make an appointment.	250.00	0.80	
10/17/2024	WTS	Review depositions, summarize in preparation for meeting with clients and trial.	250.00	3.00	
10/18/2024	WTS	Review Order and Joint Memorandum for filing with the Court.	250.00	1.00	
10/21/2024	WTS	Meeting with Sharif Jaber and sons, telephone call with Dan DeSouza.	250.00	0.80	
10/23/2024	WTS	Review email from plaintiff's counsel. Review case law and draft response.	250.00	0.80	
	WTS	Meet with client for trial preparations.	250.00	1.60	
10/24/2024	sĸ	Assist Attorney Steinle will trial preparations.	100.00	2.00	
10/25/2024	WTS	Trial preparations.	250.00	6.00	
10/26/2024	WTS	Meet with clients. Trial preparation.	250.00	5.00	
10/27/2024	WTS	Trial preparations.	250.00	5.00	
	SK	Assist Attorney Steinle with trial preparations.	100.00	1.30	
10/28/2024	WTS	Complete trial preparations. Attend trial. Begin working on closing argument.	250.00	10.00	
10/29/2024	WTS	Finalize closing arguments. Attend trial. LEGAL SERVICES	250.00	6.00 55.70	13,055.00

RECAPITULATION

Filed 07/09/25

HOURS HOURLY RATE

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\$100.00

250.00

2.50

49.90

TOTAL

\$250.00

12,475.00

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Prepared Food Photos, Inc. v. Jaber

	TIMEKEEPER Sue Kranz	HOURS HOURI	100.00	330.00	
	TOTAL CURRENT WORK				13,055.00
	PREVIOUS BALANCE				\$5,500.34
08/28/2024 09/30/2024	Payment received, thank you. Payment received, thank you.				-2,500.00 -1,500.00
09/30/2024	Payment received, thank you. TOTAL PAYMENTS				-1,500.00 -5,500.00
	BALANCE DUE				\$13,055.34

Your trust account balance is

Opening Balance \$0.00
10/30/2024 Advance Payment on Fees 6,000.00
Closing Balance \$6,000.00

Effective May, 1 2025, Please send all payments to:

Terschan, Steinle, Hodan & Ganzer, Ltd. 16680 Cleveland Ave. Sutie E New Berlin, WI 53151

"PLEASE WRITE ACCOUNT NUMBER ON YOUR CHECK FOR PROPER CREDIT"

Payments received after 30th day of month will be shown on your next statement.

We are now accepting credit card payments. You MUST have an email

Case 2:22-CV-00642-9 PS requirement 07/09/25 Page 25 of 34 Document 83-1

Statement Date: December 4, 2024

Account No.

7111.001

1

Page:

11/20/2024	WTS	Review Plaintiff's Motion for Amendment and Motion for New Trial		HOURS	
		with accompanying Brief with extensive attachments. Draft correspondence to client. Begin researching legal authority for Response Brief.	250.00	4.00	
	АН	Review case law, authority and federal rules. Draft outline of Brief in Opposition	250.00	3.00	
11/27/2024	WTS	Continue review of legal authority for Response Brief.	250.00	6.50	
12/02/2024	WTS	Begin drafting Response Brief.	250.00	6.10	
12/03/2024	WTS	Edit and revise Response Brief.	250.00	3.50	
12/04/2024	WTS	Edit and finalize Response Brief, file with the Court. Draft correspondence to client. LEGAL SERVICES	250.00	$\frac{1.60}{24.70}$	6,175.00
	TIME	T	OTAL		
	Amb	EKEEPER HOURS HOURLY RATE er Herda 3.00 \$250.00 imothy Steinle 21.70 250.00	\$7	50.00 25.00	
		TOTAL CURRENT WORK			6,175.00
		PREVIOUS BALANCE			\$13,055.34
11/20/2024		Payment received, thank you.			-6,000.00
		BALANCE DUE			\$13,230.34

Page: 2
Sharif Jaber 12/04/2024
Acct.# 7111-001M

Prepared Food Photos, Inc. v. Jaber

Your trust account balance is

Opening Balance \$6,000.00

11/18/2024 Payment on Invoice Dated 11/4/2024
PAYEE: Terschan, Steinle, Hodan & Ganzer, Ltd -6,000.00
Closing Balance \$0.00

Effective May, 1 2025, Please send all payments to:

Terschan, Steinle, Hodan & Ganzer, Ltd. 16680 Cleveland Ave. Sutie E New Berlin, WI 53151

"PLEASE WRITE ACCOUNT NUMBER ON YOUR CHECK FOR PROPER CREDIT"

Payments received after 30th day of month will be shown on your next statement.

We are now accepting credit card payments. You MUST have an email

Case 2:22-cv-00642-jps matter of the companion of the companio

Exhibit B



Prepared Under Direction of the American Intellectual Property Law Association Law Practice Management Committee

> American Intellectual Property Law Association 14,00 Crystal Drive. Suite 600 Arlington, VA 22202

www.aipla.org

Private Firm, Partner

Average hourly billing rate in 2022 (Q33)

Private Firm, Equity Partner

		Average hourly billing rate in 2022					
		Number of Individuals	Mean	First Quartile 25%	Median (Midpoint)	Third Quartile 75%	
All Individuals		218	(Average) \$585	\$400	\$500	\$663	
All Individuals	7-9	3	\$643	ISD	\$500	ISI	
Venns of ID Law	10-14	26	\$527	\$350	\$450	\$500	
Years of IP Law Attorney	15-24	75	\$545	\$395	\$475	\$68	
Experience	25-34	89	\$610	\$418	\$525	\$663	
~	35 or More	19	\$694	\$500	\$610	\$700	
	Boston CMSA	4	\$713	\$431	\$713	\$994	
	NYC CMSA	17	\$761	\$500	\$670	\$1,02	
	Philadelphia CMSA	8	\$620	\$481	\$575	\$82	
	Washington, DC CMSA	20	\$702	\$478	\$603	\$99	
	Other East	16	\$543	\$376	\$488	\$59	
	Metro Southeast	11	\$557	\$400	\$500	\$54	
	Other Southeast	8	\$433	\$377	\$435	\$483	
Location	Chicago CMSA	14	\$630	\$494	\$623	\$654	
	MinneSt. Paul PMSA	16	\$495	\$353	\$468	\$61	
	Other Central	38	<mark>\$441</mark>	<mark>\$341</mark>	\$403	\$51	
	Texas	23	\$619	\$450	\$500	\$850	
	Los Angeles CMSA	5	\$560	\$365	\$500	\$78	
	San Francisco CMSA	6	\$993	\$534	\$810	\$1,546	
	Other West	32	\$565	\$403	\$448	\$600	
	Biotechnology	10	\$631	\$405	\$560	\$813	
	Chemical	9	\$495	\$358	\$450	\$580	
ID # to to I	Computer Hardware	3	\$440	ISD	\$470	ISI	
IP Technical Specialization	Computer Software	25	\$596	\$400	\$495	\$700	
(>=50%)	Electrical	17	\$596	\$400	\$550	\$710	
	Mechanical	36	\$473	\$376	\$440	\$524	
	Medical/Health Care	9	\$478	\$335	\$435	\$615	
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	Pharmaceutical	3	\$856	ISD	\$687	ISE	
	35-39	16	\$486	\$350	\$445	\$494	
	40-44	22	\$583	\$358	\$470	\$588	
Age	45-49	24	\$581	\$400	\$485	\$784	
	50-54	43	\$521	\$390	\$475	\$600	
	55-59	57	\$636	\$425	\$550	\$685	
	60 or Older	51	\$595	\$420	\$520	\$650	
	Male	175	\$585	\$400	\$500	\$650	
Gender	Female	36	\$524	\$386	\$475	\$615	
·	Prefer not to respond  Bachelor's Degree	4	\$570	\$383	\$453	\$875 \$625	
Highest Non-Law	Master's Degree	143 50	\$567	\$400	\$495		
Degree	Doctorate Degree	21	\$601 \$594	\$4 <b>1</b> 1 \$395	\$500 \$540	\$705 \$725	
	White/Caucasian	178		\$400	\$500		
	Black/African American	3	\$569 \$450	ISD	\$450	\$650 ISE	
	Hispanic/Latino	3	\$1,050	ISD	\$850	ISE	
Ethnicity	Asian/Pacific Islander	8	\$554	\$343	\$413	\$851	
Lennicity	Mixed Race	7	\$475	\$400	\$450	\$550	
	Prefer not to respond	13	\$699	\$453	\$535	\$1,013	
	Other	3	\$610	ISD	\$555	ISC	
	1-2	24	\$441	\$356	\$423	\$499	
	3-5	36	\$498	\$381	\$418	\$515	
ull-time	6-10	21	\$449	\$393	\$440	\$550	
ntellectual	11-25	42	\$548	\$397	\$475	\$626	
Property lawyers and agents in the	26-50	25	\$562	\$438	\$500	\$640	
irm or	51-100	36	\$674	\$500	\$625	\$851	
corporation	101-150	11	\$656	\$360	\$650	\$850	
			7000	7500	\$1,015	ارور	

### Litigation-Copyright Infringement <\$1M Initial case management (000s) by Type of Practice (Q49Aa)

	Total	1-3 Attorneys	4-15 Attorneys	16-59 Attorneys	60 or more Attorneys	All Corporate
Number of Respondents	18	9	4	1	4	0
Mean (Average)	\$52	\$62	\$13	ISD	\$79	ISD
First Quartile 25%	\$5	\$4	\$4	ISD	\$24	ISD
Median (Midpoint)	\$15	\$5	\$15	ISD	\$55	ISD
Third Quartile 75%	\$35	\$19	\$19	ISD	\$159	ISD

### Litigation-Copyright Infringement <\$1M Inclusive of discovery, motions, and claim construction (000s) by Type of Practice (Q49Ab)

******		Total	1-3 Attorneys	4-15 Attorneys	16-59 Attorneys	60 or more Attorneys	All Corporate
Number of Respondents		15	7	4	1	3	0
Mean (Average)	-	\$136	\$87	\$90	ISD	\$325	ISD
First Quartile 25%		\$60	\$12	\$70	ISD	ISD	ISD
Median (Midpoint)		\$100	\$80	\$100	ISD	\$300	ISD
Third Quartile 75%		\$200	\$150	\$100	ISD	ISD	ISD

### Litigation-Copyright Infringement <\$1M Inclusive of pre-trial, trial, post-trial, and appeal (when applicable) (000s) by Type of Practice (Q49Ac)

	•.	Total	1-3 Attorneys	4-15 Attorneys	16-59 Attorneys	60 or more Attorneys	All Corporate
Number of Respondents		14	6	4	1	3	0
Mean (Average)		\$296	\$133	\$175	ISD	\$800	ISD
First Quartile 25%		\$80	\$16	\$54	ISD	ISD	ISD
Median (Midpoint)		\$193	\$125	\$193	ISD	\$700	ISD
Third Quartile 75%		\$438	\$215	\$278	ISD	ISD	ISD

# Composite Exhibit C



101 NE 3rd Avenue, Suite 1500 - Fort Lauderdale, FL 33301 Office 954.755.6401 - Fax 954.827.7778 daughtersreporting@gmail.com - daughtersreporting.com

### INVOICE

TERSCHAN, STEINLE, HODAN & GANZER LTD

ATTN: W. Timothy Steinle, Esq. 309 North Water Street, Suite 215 Milwaukee, WI 53202

In Re: PREPARED FOOD PHOTOS, INC. f/k/a ADLIFE MARKETING & COMMUNICATIONS CO., INC. vs. NOFAL LLC

d/b/a FOOD TOWN MART and SHARIF JABER

Case Number: 2:22-cv-00642-JPS

Witness(s): Sharif Jaber, Corporate Representative

Attendance Date: 09/26/2023, 1:00 p.m.

Reporter: Jamie Mackrell

Location: VIDEOCONFERENCE - via Zoom

Description Amount

**Deposition of Sharif Jaber** 

Certified Copy - 60 pgs 225,00

Mini/Condensed transcript, no charge Transcript(s) emailed upon payment

> Invoice Total: 225.00

Invoice Number:

Invoice Date: 09/28/2023

315384

### **DAUGHTERS HAS GONE GREEN!**

Daughters Reporting works remotely and we are always available. Email us for all your court reporter needs!!!

Thank you!

### INVOICE DUE WITHIN 30 DAYS. Tax ID: 46-4642885

Please detach bottom portion and return with payment

Invoice Number: 315384

Invoice Date: 09/28/2023 Amount Due: \$225.00

Amount Enclosed: \$_

CREDIT CARDS ACCEPTED

VISA'





Cardholder's Name: Card Number: Exp. Date: Phone: Billing Address: Zip: Security Code: Signature:





101 NE 3rd Avenue, Suite 1500 - Fort Lauderdale, FL 33301 Office 954.755.6401 - Fax 954.827.7778 daughtersreporting@gmail.com - daughtersreporting.com

### INVOICE

TERSCHAN, STEINLE, HODAN & GANZER LTD

ATTN: W. Timothy Steinle, Esq. 309 North Water Street, Suite 215 Milwaukee, WI 53202

Invoice Date: 01/08/2024

Invoice Number:

In Re: PREPARED FOOD PHOTOS, INC. f/k/a ADLIFE MARKETING & COMMUNICATIONS CO., INC. vs. NOFAL LLC

d/b/a FOOD TOWN MART and SHARIF JABER

Case Number: 2:22-cv-00642-JPS Witness(s): Amjad S. Hamed

Attendance Date: 12/18/2023, 11:00 a.m.

Reporter: Jamie Mackrell

Location: VIDEOCONFERENCE - via Zoom

Jaber, Sharif

井7111.001

Description Amount

Deposition of Amjad S. Hamed

Certified Copy - 51 pgs

191.25

315998

Mini/Condensed transcript, no charge Transcript(s) emailed upon payment

> Invoice Total: 191.25

### **DAUGHTERS HAS GONE GREEN!**

Daughters Reporting works remotely and we are always available. Email us for all your court reporter needs!!!

Thank you!

### INVOICE DUE WITHIN 30 DAYS. Tax ID: 46-4642885

Please detach bottom portion and return with payment

Invoice Number: 315998 Invoice Date: 01/08/2024 Amount Due: \$191.25 Amount Enclosed: CREDIT CARDS ACCEPTED

Card Number Exp. Date: Billing Address: Zip: Signature:

Cardholder's Name: Security Code: